

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

JESSICA FRYREAR

PLAINTIFF

v.

CIVIL ACTION NO.: 4:22-CV-112-MPM-DAS

**WASHINGTON COUNTY, MISSISSIPPI
JARRELL EVANS AND CEDRICK ADAMS,
in Their Individual Capacities for State Law
Violations Only**

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW, DEFENDANT, Washington County, Mississippi, by and through counsel, and prays that this Court grant an extension through and including December 13, 2022, to file its Replies in Support of its Motion for Judgment on the Pleadings [**Doc. 19**] and Motion to Stay [**Doc. 21**], respectively, to-wit:

1. Defendant Washington County, Mississippi, filed its Motion for Judgment on the Pleadings [**Doc. 19**] on October 25, 2022.
2. Plaintiff filed her Response in Opposition [**Doc. 25**] on November 22, 2022.
3. Additionally, Defendant Washington County, Mississippi, filed its Motion to Stay [**Doc. 21**] on October 25, 2022.
4. Plaintiff filed her Response in Opposition [**Doc. 27**] on November 22, 2022.
5. Defendant's deadline to submit its Replies to Plaintiff's Responses to said motions is currently Tuesday, November 29, 2022.
6. In addition to the Thanksgiving holiday, Counsel for Defendant is set to begin trial in another matter on Monday, December 5, 2022, and is actively preparing for same. As such, this

Defendant respectfully requests this Court enter an Order extending the deadline to file a reply to each of Plaintiff's responses for an additional fourteen (14) days, until and including Tuesday, December 13, 2022.

7. Undersigned counsel for Defendant has contacted counsel for the Plaintiff regarding this extension, and said counsel has no objection to this extension and has agreed to same.

8. The Motion is not being made for the purpose of delay, and Plaintiff will not be prejudiced by such an extension of time.

WHEREFORE PREMISES CONSIDERED, Defendant Washington County, Mississippi, respectfully requests that this Honorable Court enter an order extending the deadline to submit its Replies in Support of its Motion for Judgment on the Pleadings [**Doc. 19**] and Motion to Stay [**Doc. 21**] for an additional fourteen (14) days, until and including Tuesday, December 13, 2022.

RESPECTFULLY SUBMITTED this the 28th day of November, 2022.

JACKS GRIFFITH LUCIANO, P.A.

By: /s/ ***Bethany A. Tarpley***

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CERTIFICATE OF SERVICE

I, Bethany A. Tarpley, attorney of record for Defendant, Washington County, Mississippi, do hereby certify that I have this day caused a true and correct copy of the above and foregoing *Unopposed Motion for Extension of Time* to be delivered by the ECF Filing System which gave notice to the following:

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DATED this 28th day of November, 2022.

/s/ **Bethany A. Tarpley**
Bethany A. Tarpley